



Global Privacy Policy

Telefónica, S.A.

Corporate Regulation

Approved by the Board of Directors of Telefónica S.A.

4th Edition - May 2024

Change tracker

Edition	Modifications
1.0 (2013)	First Version of the “ Privacy Policy of the Telefónica Group ”
2.0 (2015)	Updated and aligned with new Company Programme “ Choose it all ” (December 2015).
3.0 (2018)	Major Review aligned with Company Strategy and General Data Protection Regulation (GDPR)
4.0 (2024)	<ul style="list-style-type: none">- Section 1: Express mention of Telefónica’s Human Rights due diligence process- Section 3.2: Mention of the Transparency Centers of the Group’s operations and the Global Transparency Centre- Section 3.5: Reference to the Global Security Policy- Section 5: Incorporation of commitments with European data protection authorities in relation to the BCRs approval process. Specific mention of the Transparency Centers- Section 8: Risk orientation in Privacy by Design- Throughout the document, minor editorial changes and improvements in terminology

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1. Introduction and objectives

The universal use of electronic communications services and networks—especially the Internet and its functionalities, the deployment of high-speed network and the exploitation of its capabilities, the availability of high-computing capacity devices and increased storage volumes—is changing social and commercial relationships, and the way in which societies communicate and express themselves, as well as the amount and nature of information to which both citizens and companies have easy access. As a result of this, personal information is increasingly being processed, both in the context of personal or professional activities, and within the scope of the provision of digital services to clients and/or users.

As provider of these types of services, Telefónica firmly believes that the adequate access and processing of this information offers great opportunities for enriching the lives of citizens and contributing to the development of societies.

Telefónica respects the rights and freedoms of individuals, among which is the fundamental right to the protection of personal data and has a due diligence process to identify, prevent and mitigate the possible impacts that could occur. The Responsible Business Principles, the Group's code of ethics, and the Global Human Rights Policy refer to the need to protect this fundamental right and establish common guidelines for all its companies to this end.

Telefonica is very much aware of the fact that the trust the customers and other stakeholders place in the company is critical and must give them control over their personal information (as "**Data Subjects**"), which is why the present Telefónica Global Privacy Policy is issued with the goal of strengthening the Group's commitment to all data subjects whose information Telefónica has access to, directly or indirectly, in the relationship it has with them.

Thus, the present Policy establishes the general guidelines that Telefónica, as leading company in the industry and in the development of standards of trust in its relations with people, must progressively implement not only with a view to compliance of the legal provisions in force in each jurisdiction, but also to set a common general approach for the entire Group in terms of privacy.

For purposes of clarification, said general guidelines are subject to further and later development in more specific commitments, either general, or within any of the companies or groups of companies that are part of the Telefonica Group, taking into account the different starting points and the level or difficulty of implementation and specific actions required to promote the adequate observance of the aforementioned guidelines.

To this effect, the model of privacy governance established in section 10 of the present Policy is essential, as it will ensure a swift and efficient deployment of the actions required to comply with the guidelines.

For purposes of clarification, the present Policy refers to the privacy of the information of natural persons. Telefónica also ensures the protection of information and data of legal entities and will comply with what is established in applicable national law.

2. Scope of application

This Policy constitutes a Corporate Policy, and, as such, is to be applied in all Telefónica Group companies.

In its condition as parent company of the Group, Telefónica, S.A. is responsible for establishing the bases and mechanisms required for an adequate and efficient coordination between this Company and the other companies that are part of its Group, which, as indicated in the previous section 1, will be subject to further and later development through instruments that govern the progressive compliance with more specific commitments.

The above applies without prejudice to and without impairing the autonomous decision-making capacity corresponding to each of the companies involved, in accordance with their corporate purpose and with the fiduciary duties that the members of their management bodies have towards their shareholders.

3. Principles

In the processing of personal information, the Telefónica Group will adopt actions aimed at protecting the following basic principles:

- Principle of legality
- Principle of transparency
- Principle of commitment to the rights of the stakeholders
- Principle of limitation of the conservation period
- Principle of security

3.1 Principle of legality

The Telefónica Group will adopt the actions necessary to ensure that the personal information of the Data Subjects Parties that it collects, stores, and processes are lawfully and fairly processed.

The processing should comply with the obligations that result from the applicable legal framework, taking into account its characteristics and geographical scope and the rest of the provisions included in this Corporate Policy. In any case, the Telefónica Group will adhere to, with particular attention:

- the securing of the consent of the Data Subject or, as the case may be, the existence of any other lawfulness condition in the applicable legislation.
- the need for processing and the legitimate purpose of said processing. The personal information will be collected for legitimate purposes and will not be subsequently processed in a manner incompatible with said purposes.

3.2 Principle of transparency

The Telefónica Group will adopt the measures necessary to guarantee that the Data Subjects be provided with information that is easily accessible and understandable about the personal information that it collects, stores, and processes.

Among other general measures, the Data Subjects will be provided with the following information:

a) Type of information collected

At Telefónica, different types of personal information are collected from our users, either directly because the information is provided (such as name, surnames, address, bank account, personal preferences, etc.), or indirectly through the use of our services (locational data, calling data, content viewing data, etc.) or from legitimate third party sources.

b) How information is collected

This information is collected in different ways and through different channels.

All Data Subjects will be informed about how their information is collected when they access the products and/or services and/or channels of communication.

c) Purpose of the collected information

The information of the Data Subject may be used for different purposes depending on the type of information collected.

The Data Subject must be informed about the purpose for which its information will be used.

d) Personal Data retention

The Data Subject will be informed of the period for which the personal data will be stored, or the criteria used to determine that period the way to erasure it, when applicable, and what happens when a user deletes his/her account.

In every case, Telefónica reserves the right to use information collected from the Data Subjects in anonymous format.

e) Transfer of the information

The Data Subject will be informed about what category of information is going to be transferred, the recipients or categories of recipients and for what purpose.

The Telefónica Group promotes the creation of Transparency Centres through the websites of its operations where clear and accessible information is offered on Telefónica's personal data processing in a manner that is transparent and open. Likewise, it has a Global Transparency Centre where information is provided on the positioning and commitments of the Telefónica Group in matters of Privacy.

3.3 Principle of commitment to the rights of the Data Subject

Telefónica must offer Data Subjects clear and simple mechanisms to guarantee and ensure the correct exercise of the rights of the Data Subject, in accordance with the applicable legal framework, such as the right of access, rectification, deletion, opposition, the right to withdraw consent at any time, and the right to present complaints.

The Telefónica Group must facilitate the exercise of these rights in the deadlines and terms established in the corresponding legal system of the country and/or region.

The Telefónica Group provides its employees, customers, contractors, or any other Interested titleholder to personal information included in the databases and/or information systems owned by Telefónica Group entities, communication channels to file requests, queries, and complaints so that they may exercise applicable rights that correspond to them.

The Telefónica Group agrees to respond to these requests, queries, and complaints quickly and within the periods determined by the applicable regulations.

3.4 Principle of limitation of the conservation period

The Telefónica Group will not retain the personal information of the Stakeholder for longer than the periods of time permitted in each jurisdiction's legislation.

3.5 Principle of security of processing

The Telefónica Group will apply, in all of the processing cycle phases, the technical and organizational measures required to ensure a level of security adequate to the risk to which the personal information may be exposed and, in any case, in accordance with the security measures established in the law in force in each of the countries and/or regions in which the Global Security Policy is in force and all regulations derived thereof. If at any moment this security is compromised, Telefónica will act swiftly and responsibly.

The Telefónica Group will be particularly diligent in the analysis of those data processing situations that potentially place the rights and freedoms of the Data Subjects at high risk.

Likewise, Telefónica will always protect the confidential nature of the information of the Data Subjects, in accordance with Telefónica's internal regulations for the classification and processing of Information.

4. Conditions for consent

Telefónica will facilitate to Data Subjects clear and transparent information regarding the use and storage of their personal information so that they may consent in a freely given,

specific, informed, and unambiguous manner with respect to the proposed processing of said information, with particular attention placed on Data Subjects who are minors.

5. International transfer of information

The information provided by Data Subjects may be transferred internationally to Group companies and third parties for its processing subject to the requirements established by the legislation applicable in each country or region, and to the international agreements, where the different Telefónica Group entities operate.

In this regard, the Telefónica Group, either as Data Processor and/or Data Controller, will protect the rights of Data Subjects in the international transfer of personal information to third countries, and will, in observance of the applicable technical, legal or organisational guarantees stated under national law, at all times, as well as the Group's security standards.

Likewise, Telefónica also considers the application of the Binding Corporate Rules (BCR) that offer adequate guarantees in case of personal data transfers between Group companies.

Telefónica processes personal data subject to international transfer to the extent necessary to carry out its activity with the highest standards of protection. The entire Telefónica Group and, consequently, its employees are subject to data protection standards, rules and principles that establish a high level of protection of personal data, as described in this Global Privacy Policy. In this sense, and in line with the Group's privacy strategy aimed at generating trust in Data Subjects, the Spanish Supervision Authority has approved the Binding Corporate Rules of the Telefónica Group, which are published in the Global Transparency Centre, as referenced in Annex I. International data transfers carried out within the Group as per the scope of the Binding Corporate Rules will be governed accordingly, which are aimed at conferring a level of protection to the Personal Data being transferred that is substantially equivalent to that conferred by European Data Protection regulations. The foregoing implies that both the affiliated Telefónica Group companies and their employees are subject to the Binding Corporate Rules and are committed to always fulfilling and respecting them in the processing of personal data subject to international data transfer. The breach of the Binding Corporate Rules may entail taking disciplinary measures.

6. Privacy of minors

The Telefónica Group is committed to the privacy rights of minors, the protection of their personal information, and the promotion of the responsible use of technology.

7. Privacy in the supply chain

The Telefónica Group, when acting as Data Controller or Data Processor, will provide contractually that any supplier or third party that acts under its authority and/or has access to the personal information of the Data Subjects, will only be able to process said information by following its instructions and/or to comply with the legitimate purposes pursued in the course of the established relationship, in every case, in a secure manner through the adoption of the necessary technical and organizational security measures, and full compliance with the applicable law and internal regulations.

Thus, each Data Controller will prioritize, in choosing these suppliers, those that ensure a higher or more satisfactory degree of compliance with the data protection legislation applicable to the processing in question, as well as with this Policy.

8. Privacy by design

Telefonica embraces the principles of Privacy by design and Accountability in the development of its products and services in order that, from its initial conception, they incorporate the applicable data protection requirements.

Special attention is paid to the application from the design of the principles listed in this Policy, as well as a risk-oriented analysis and definition of the product or service requirements.

This risk-oriented application will take into account the privacy impacts and opportunities offered by responsible product design from the viewpoint of personal data protection.

9. Requests by competent authorities

Telefónica is subject to the legal environments in which it operates, meaning that, in exceptional circumstances and always within the express provisions of national laws, it must respond to the requirements of the competent authorities related to certain information about the communications of its customers and/or users.

Telefónica, in all of these cases, implements a strict global procedure that guarantees both compliance with our obligations regarding collaboration with judicial authorities and competent authorities, and the protection of the rights to privacy and freedom of expression of the affected parties.

Telefónica will periodically publish information on the legal context and requests it receives from competent authorities in the countries in which it operates.

10. Organization and Responsibilities

In order to guarantee the rights, in terms of data protection of Data Subjects and companies, with which the Telefónica Group relates, as well as the compliance with the

applicable laws and this Global Privacy Policy, it is important each operating business dedicates the appropriate resources to the implementation of this Policy. The Telefónica Group has set up the corresponding organization, the basic structure of which is as follows:

10.1 Data Protection Officers

The different Telefónica Group entities and companies must appoint a Data Protection Officer (hereinafter, "DPO") or a Local Privacy Champion, who acts as contact person for the entity.

Each DPO or Local Privacy Champion will be appointed according to his/her professional skills, knowledge and experience with respect to data protection, as well as knowledge regarding the corresponding business and of the Group as a whole.

The Telefónica Group considers it appropriate to establish two levels of DPO, global and local, in order to better coordinate and observe the compliance of this Corporate Policy and other applicable legal and internal regulations.

10.1.1 Telefónica Group DPO

The Telefónica Group DPO is the Telefónica Group's person in charge at corporate level of data Protection. The Telefónica Group DPO reports directly to the Telefónica, S.A. Board of Directors.

The main duties and functions of the Telefónica Group DPO are:

- The global data protection coordination in the Telefónica Group, and the definition of the global compliance program in terms of privacy.
- The supervision of compliance with the current data protection legislation in force.
- Exchange and advice in terms of the processing of personal data, to the Telefónica, S.A. Organization, and to the Group's local DPOs, as the case may be.
- The implementation and application of the privacy and data protection policies, and the assessment of new related projects.
- The performance of the duties which, in general, may be attributed to him/her by the applicable legislation (i.e., those established in the European General Data Protection Regulation).

The Telefónica Group DPO leads and coordinates the Global DPO Office which plays a double role: on the one hand, it takes on direct responsibility over the compliance program in matters of privacy in the global and corporate scope, and, on the other, the guarantee of the implementation of the program within the Telefónica Group.

10.1.2 Local DPO

The Local DPO (or Local Privacy Champion, regardless of the terminology adopted in applicable legislation), is the person responsible for the protection of personal data in one or several Telefónica Group companies located in a specific country/region, or within a specific area of activity

The main functions of the Local DPO are:

- Advisory with respect to data protection, for the business units within his/her scope of responsibility.
- Supervision of compliance with the applicable law and this Privacy Policy within his/her scope of responsibility.
- Exchange and coordination with the Telefónica Group DPO for the purpose of implementing the global compliance program in terms of privacy.
- Dialogue with Data Subjects and authorities within his/her scope of responsibility.
- The performance of the duties which, in general, may be attributed to him/her by the applicable legislation (i.e. those established in the European General Data Protection Regulation).

10.2 Relationship structure

Without prejudice of the duties and responsibilities of the Telefónica Group DPO and that of the local DPOs or Privacy Champions, the Telefónica Group, to better implement the privacy compliance program, deems it necessary to create a relationship structure for the purposes of supporting, coordinating, assessing, and proposing lines of action in relation to said program. and, in general, with respect to compliance with Data Protection legislation.

In particular, the Telefónica Group considers appropriate to establish the following formal relationship channels (through regular interactions and, in particular, the convening of the Committees that will be set up for this purpose):

- i. Transversal relationships: based on the premise of the importance of the Telefónica Group global units, in contributing to the successful implementation of the privacy compliance program, each within their scope of responsibility; for this reason, a continuous relationship with the DPO Global Office must be maintained. The following units, amongst others, are included in this group: Security, General Counsel/Legal Services, Regulation and Public Affairs, Technology, Chief Digital Officer, Compliance, Corporate Ethics and Sustainability, and Internal Audit.
- ii. Business relationships: ultimately, the business units are responsible for the implementation of the privacy compliance program, meaning that their own internal regulations and business processes must at all times take into

consideration said program; with this goal, interfaces that guarantee the interaction with the DPO Global Office, or the Local DPO/Local Privacy Officer, respectively, will be appointed both in Telefónica, S.A. and in those business units in which this is deemed appropriate.

- iii. Relationship between business units: under the coordination of the DPO Global Office, the coordinated with the Local DPOs/Local Privacy Officers will be ensured for the purposes of monitoring the compliance program in terms of privacy, and for the review of problems that affect the set of organizations.

11. Training and awareness

The Telefónica Group is aware that the gradual elevation of standards of compliance with the applicable legislation as well as the Telefónica Group's internal regulation in terms of privacy and data protection, is conditional upon the generation of a company culture based on understanding and knowledge on the part of its employees and the parties that are part of its supply chain.

The generation of such culture in turn requires training and awareness initiatives to be developed within the framework of Telefonica's comprehensive training and communication plans, in first instance for employees, and to the extent possible, for the third parties that interact with Telefonica.

12. Monitoring and control

In its commitment to continuous supervision and improvement, the Telefónica Group, and each company that belongs to it, periodically submits its processing of personal data to internal or external controls and/or audits in order to verify the correct compliance with the legal regulations applicable to each entity, as well as with this Global Privacy Policy, and the regulations and procedures that develop it, determining degrees of compliance, and recommending corrective measures.

In particular, the present Policy may be the subject of development of regulation that establishes the mechanisms necessary for the supervision and control of its compliance.

In those data processing activities in which the Telefónica Group is Data Controller, it may require, by contract, from those Data Processors with which it works, audit or certification mechanisms in order to ensure that these entities offer sufficient guarantees to carry out their processing operations.

13. Internal Audit

The observance and compliance with this rule by the different areas of the Company will be subject to review and supervision by the Internal Audit area, who will be authorized to carry out the sampling supervisions of the controls established herein whenever it deems convenient.

14. Review and modifications

This Global Privacy Policy shall be revised to adapt to Organisational, legal or business changes that take place, in order to maintain its applicability, sufficiency and effectiveness. Otherwise, it must be revised according to the periodicity put forth in the “Corporate Regulations for the Elaboration and Organisation of the Telefónica Group’s Regulatory Framework.”

This Corporate Policy will be periodically reviewed, taking into consideration any organizational, legal, or business changes that may take place.

The reviews of the Policy, insofar as they affect the conditions of privacy with stakeholders agreed upon by the Telefónica Group, will be subject to timely publication and communication.

15. Implementation and application

This Global Privacy Policy will enter into effect on the day of its approval by the Board of Directors.

Annex I

Binding Corporate Rules of the Telefónica Group

Telefónica, in its interest in ensuring the correct use of personal data and maintaining Privacy, has worked on the development and approval of its Binding Corporate Rules, also known as BCRs. This approval has been granted by the AEPD (Spanish Supervision Authority) after the participation of the rest of the European authorities and the European Data Protection Committee (EDPB).

These BCRs guarantee the safe execution of international transfers, that is, they facilitate the communication of data within companies of the Telefónica Group to other countries that are outside the European Economic Area and represent a commitment and guarantee of good privacy governance within the group.

This guarantee created by the BCRs of the Telefónica Group in terms of good privacy governance is what enables the international transfer of data between its companies.

All of this implies an obligation to act responsibly, a reinforcement of the protection of people's rights, and the good work done by Telefónica in relation to the processing of personal data, which represents a better reputation of the Telefónica Group.

The Binding Corporate Rules of the Telefónica Group are published at:

<https://www.telefonica.com/es/centro-global-de-transparencia/privacidad/normas-corporativas-vinculantes/>



www.telefonica.com